

F I S H E R | T A U B E N F E L D L L P

225 Broadway, Suite 1700
New York, New York 10007
Main 212.571.0700
Fax 212.505.2001
www.fishertaubenfeld.com

Writer's direct dial: (212) 384-0258
Writer's email: michael@fishertaubenfeld.com

June 24, 2022

VIA ECF

Hon. John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Rene v. 31 East 21 Express Inc. et al.
Case No.: 21-cv-7435 (JGK) (KHP)

Dear Judge Koeltl:

We represent Plaintiff in this action. We write to respectfully request that the Court extend fact discovery from July 1, 2022 until August 31, 2022. This is the first request by any party, and the lone answering Defendant consents to the request.

The reason for the request is that although the parties exchanged discovery requests and responses, to preserve resources they have been focused on mediating and resolving the matter rather than taking costly depositions. Unfortunately, the case was not settled at the mediation on June 17, 2022, and the parties will now proceed to depositions. Plaintiff will also amend the complaint by today's deadline to include the owner of the answering Defendant as a Defendant. Given the new party and the parties' need to take depositions, Plaintiff requests an extension of discovery. Further, because my family will be traveling to Israel from early July until July 21, 2022 for a much-anticipated bar mitzvah trip, I will be unavailable to take or defend depositions until early August. We therefore respectfully request an extension of discovery until August 31, 2022.

Thank you for your attention to the above.

Respectfully Submitted,

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Michael Taubenfeld